



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF WATER RESOURCES

William R. Snodgrass - Tennessee Tower
312 Rosa L. Parks Avenue, 11th Floor
Nashville, Tennessee 37243-1102

October 17, 2016

The Honorable Justin Hanson
Mayor
City of Covington
200 W. Washington Ave.
Covington, TN 38019

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
RECEIPT # 7196 9008 9111 3807 5139

Re: Pretreatment Audit Inspection
Covington Pretreatment Program
NPDES Permit No. TN0020982
Tipton County
Notice of Violation

Dear Mayor Hanson:

Thank you for your staff's time on August 29-30, 2016, when Mr. Eddy Bouzeid and Ms. Yatasha Moore conducted a pretreatment audit inspection of Covington's industrial pretreatment program. The comments below are based on the results of this inspection.

1. During the inspection, the files for Unilever Manufacturing (US), Inc. (Unilever) and Charms Company (Charms) were reviewed. Covington's pretreatment staff was unable to locate documentation showing that Covington inspected these industries in 2015. Tennessee Rule 0400-40-14-.08(6)(b)5. requires Covington to inspect each significant industrial user (SIU) at least once every 12 months. Therefore, this letter serves as a Notice of Violation for failure to inspect each SIU. Covington should take appropriate actions to ensure that in the future all SIUs are inspected at the appropriate frequency.
2. Covington's NPDES permit was issued on March 1, 2016 and became effective on April 1, 2016. Part 3.2a. requires Covington to submit the results of an updated industrial waste survey (IWS) within 120 days of the effective date of the permit. However, the updated IWS has not been received by this office as of the date of this letter. Therefore, this letter serves as a Notice of Violation for failure to submit the required IWS. Covington should update the IWS and submit the results to this office by February 1, 2017.
3. Part 3.2a of the NPDES permit also requires Covington to submit a technical evaluation of the need to recalculate local limits within 120 days of the effective date of the permit. As of the date of this letter, this report has not been received. Therefore, this letter serves as a Notice of

Violation for failure to submit the required technical evaluation of the need to recalculate local limits. Additionally, Covington was unable to locate the calculations for the current local limits during the inspection. Covington should take the following actions:

- a. Covington should locate the calculations for the current local limits and perform a technical evaluation of the need to recalculate these limits.
 - b. If the calculations for the current local limits cannot be located, Covington should begin the process of recalculating the local limits.
 - c. Covington should notify this office, by January 9, 2017, of the status of completing these items. If the local limits need to be recalculated, the response should include the date by which Covington anticipates submitting the proposed local limits and calculations to this office for review and approval.
 - d. Covington should take appropriate actions to ensure that in the future copies of both the local limits and the supporting calculations are maintained in the files.
4. Both Unilever and Charms have submitted slug discharge control plans. However, the plan for Charms was signed in 1999 and the plan for Unilever was not signed and dated. Covington should take appropriate actions to ensure that all industries that are required to have a slug discharge control plan submit a signed copy of the plan to Covington. Additionally, Covington should require that each industry routinely review their slug discharge control plan and update the plan as necessary.
5. It is our understanding that Covington's previous pretreatment coordinator retired on April 31, 2016, and Covington's current staff responsible for the pretreatment program does not have any prior pretreatment experience. Staff was unfamiliar of many of the program requirements, and several of the deficiencies noted during the inspection were due to a lack of experience. Because pretreatment is a very complex program, this office strongly recommends that Covington's pretreatment staff attend training in order to ensure that the pretreatment program is properly implemented.

We appreciate the cooperation and hospitality shown during the inspection. Please provide this office, by November 21, 2016, a written description of the actions Covington will take to address these comments. If you have any questions or comments, please do not hesitate to contact Yatasha Moore at (615) 253-5321 or Yatasha.Moore@tn.gov.

Sincerely,



Jessica Murphy

Manager

Compliance and Enforcement Unit

cc: Mr. David Gray, Public Works Director – City of Covington
Mr. James Mason, Chief Operator – City of Covington
Mr. Calvin Johnson, Utility Manager – City of Covington
Mr. Eddy Bouzeid – Division of Water Resources, Memphis EFO